IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

:

:

v. : Docket No.: 1:14-306-005

Hon. Gerald Bruce Lee

CHRISTIAN LEMUS CERNA, : Trial Date: March 21, 2016

:

Defendant :

MOTION TO ADOPT CO-DEFENDANT'S MOTIONS

COMES NOW the Defendant, Christian Lemus Cerna, by and through counsel, and hereby moves this Honorable Court for leave to join the following motions:

- Motion to Sever Defendant or, Alternatively, Exclude Statements of Co-Defendants (Dkt. #627)
- Motion for Disclosure of Recorded Calls and Corresponding Transcripts the Government Intends to Use at Trial (Dkt. #628)
- 3. Motion in Limine to Exclude Expert Testimony (Dkt. # 629).

Respectfully submitted,

CHRISTIAN LEMUS CERNA By Counsel

/s/

CHRISTOPHER AMOLSCH Virginia Bar No.: 43800 12005 Sunrise Valley Drive Suite 200 Reston, Virginia 20191 (703) 969-2214 (703) 774-1201 (Fax)

chrisamolsch@yahoo.com

/s/

KEVA J. MCDONALD Virginia Bar No.: 72197 The Law Office of Keva J. McDonald 4000 Legato Road, Suite 1100 Fairfax, Virginia 22033 (703) 896-7669 (571) 335-0763 (fax) kmcdonaldlaw@aol.com

/s/

FRANK SALVATO VirginiaBar No.: 30453 Salvato Law 1203 Duke Street Alexandria, Virginia 22314 (703) 548-5000 (703) 739-0179 (fax) frank@salvatolaw.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 12th day of February, 2016, I electronically filed the foregoing Motion to Adopt with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

Stephen M. Campbell Assistant United States Attorney Attorney for the United States United States Attorney's Office 2100 Jamieson Avenue Alexandria Virginia 22314 Steve.Campbell@usdoj.gov

Julia Martinez
Assistant United States Attorney
Attorney for the United States
United States Attorney's Office
2100 Jamieson Avenue
Alexandria Virginia 22314
Julia.Martinez@usdoj.gov

Tobias Tobler Assistant United States Attorney Attorney for the United States United States Attorney's Office 2100 Jamieson Avenue Alexandria Virginia 22314 Tobias.Tobler@usdoj.gov